



U.S. Department
of Transportation

**Research and
Special Programs
Administration**

400 Seventh Street, S.W.
Washington, D.C. 20590

MAY 27 1999

Mr. Mike Lopez
Safety and Compliance Associates, Inc.
P.O. Box 48
Trussville, Alabama 35173

Ref. No. 99-0128

Dear Mr. Lopez:

This responds to your letter, dated May 10, 1999, concerning the requirements for cylinder repair and marking in the Hazardous Materials Regulations (HMR; 49 CFR Parts 171-180). Your specific questions are paraphrased and answered below.

Q1: Is a company that is neither a cylinder manufacturer nor an authorized repair facility allowed to braze, weld, or perform similar applications involving heat to attach gas inlet, outlet, and/or vent fittings to the piping system of a DOT 4L cylinder?

A1: No. Section 173.34(i) of the HMR authorizes repair of a DOT-4 series cylinder by welding or brazing to be performed only by a manufacturer of this type of DOT specification cylinder or by a repair facility approved by the Associate Administrator for Hazardous Materials Safety.

Q2: Is a company that is neither a cylinder manufacturer nor an authorized repair facility allowed to braze, weld, or perform similar applications involving heat to any portion of the footring, neckring, top ring, or top ring supports of a DOT-4 series cylinder for the purpose of attaching an identifying plate or marking plate pursuant to § 173.34(c)?

A2: No. See response to Question 1 above.



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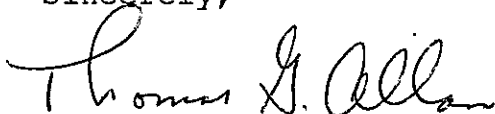
173.34

Q3: What is the maximum allowable stamping depth for DOT specification cylinders?

A3: Generally, markings on cylinders must be of a size and depth that will not create harmful stress concentrations. The marking application must ensure that the wall thickness from the root of the stamping to the interior surface is greater than or equal to the minimum wall thickness as prescribed in the manufacturing specification. The person applying the marking may need to consult with the cylinder manufacturer to determine allowable stamping depths.

I hope this information is helpful. If you have further questions, please do not hesitate to contact this office.

Sincerely,

A handwritten signature in cursive script, reading "Thomas G. Allan".

Thomas G. Allan
Acting Director, Office of Hazardous
Materials Standards



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May 10, 1999

U S Department of Transportation
Office of Hazardous Materials Standards
400 7th Street SW, DHM-18
Washington, DC 20210

Attention: Mr. Ed Mazzullo, Director of Hazardous Materials Standards

Dear Mr. Mazzullo,

173.34 (h) through (l) speaks of "repair" and "pressure parts." These terms cause some confusion regarding 1) the permanent attachment of inlet and outlet fittings and 2) the attachment of marking plates pursuant to §173.34(c).

Will you please answer the following:

1. Is a company who is neither a cylinder manufacturer nor an authorized repair facility allowed to braze, weld, or perform similar applications involving heat to attach gas inlet, outlet and/or vent fittings to the piping system of DOT 4L cylinders which will be used in transportation?
2. 173.34(i)(4)(i) states that a repair or replacement of a nonpressure attachment of a DOT 4L cylinder must only be made by a cylinder manufacturer or DOT-authorized repair facility. Is a company who is neither a cylinder manufacturer nor an authorized repair facility allowed to braze, weld, or perform similar applications involving heat to any portion of the footring, neckring, top ring, or top ring supports of DOT 4-series cylinders, including 4L cylinders, for the purpose of attaching an identifying plate, or marking plate pursuant to §173.34(c)?
3. Occasionally, DOT specification cylinders, especially DOT 3AL cylinders, are found to have been stamped on the cylinders' shoulders by cylinder manufacturers and subsequent retesters, to depths which appear to be excessive. What is the maximum allowable stamping depth for specification cylinders?

Thank you.

Sincerely,

Mike Lopez
Safety & Compliance Associates, Inc.

Gorsky

§ 173.34

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